

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:	Bankruptcy No. 25-01682-5-JNC
HEADWAY WORKFORCE SOLUTIONS, INC., <i>et al.</i> ¹ Debtors.	Chapter 11 (Jointly Administered)

**DEBTORS' DESIGNATION OF EXHIBITS AND
POTENTIAL WITNESSES FOR JUNE 10, 2025 HEARING**

Headway Workforce Solutions, Inc. *et al.*, (collectively, the “Debtor”), the above-captioned debtor in possession, hereby files this Designation of Exhibits and Potential Witnesses. The Debtor discloses the following exhibits and potential witnesses in connection with the hearing scheduled for June 10, 2025 at 10:00 a.m. on the following matters:

- Debtor’s Application for Approval of Officer Compensation [DE# 40]
- Debtors’ Amended Expedited Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Post Petition Financing, (II) Granting Senior Liens and Superpriority Administrative Expense Status, (III) Authorizing Use of Cash Collateral, (IV) Granting Limited Relief from the Automatic Stay, and (V) Granting Related Relief [DE# 56]
- Debtor’s Motion to Waive Local Rule 4002-1 Requirement to Close all Prepetition Bank Accounts and Order Approving the Continued Use of the Debtor’s Bank Account and Business Forms [DE# 57]
- Debtor’s Emergency Motion to Establish a Procedure for Trading in Claims or Equity Securities [DE# 77]
- Debtor’s Emergency Motion for Entry of (I) an Order (A) Authorizing and Approving Bidding and Sale Procedures with Respect to the Sale of Substantially All of the Debtors Assets, (B) Authorizing the Entry into a Stalking Horse Agreement and the Provision of Stalking Horse Protections, (C) Scheduling an Auction and Sale Hearing and Approving the Form and Manner of Notice Thereof and (D) Granting Related Relief; and (II) An Order Approving the Sale of Such

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors Federal Employer Identification Number: Headway Workforce Solutions, Inc. (4871); Staffing 360 Solutions Inc., (0859); Monroe Staffing Services LLC (1204); Key Resources, Inc. (9495); Lighthouse Placement Services, Inc. (8093).

Assets and Related Relief, Motion to Sell Free & Clear of Liens [DE# 66] and
Supplemental Asset Purchase Agreement [DE# 85]

Designation of Exhibits²

- (1) DIP Budget
- (2) Memorandum of Understanding
- (3) Administrative Services Agreement
- (4) Declaration of Brendan Flood
- (5) Affidavit of Brendan Flood in Support of DIP Financing Motion

Designation of Potential Witnesses

- (1) Brendan Flood
 - a. Title: Chairman and Chief Executive Officer, Headway Workforce Solutions, Inc.

Respectfully submitted, this the 9th day of June, 2025.

HENDREN, REDWINE MALONE, PLLC

s/ Rebecca Redwine Grow

Jason L. Hendren (NC State Bar No. 26869)
Rebecca Redwine Grow (NC State Bar No. 37012)
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ATTORNEYS FOR DEBTOR

² The Debtor and interested parties are still in negotiations and reserve the right to supplement the notice of exhibits and witnesses.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing ***DEBTOR'S DESIGNATION OF EXHIBITS AND POTENTIAL WITNESSES FOR JUNE 10, 2025 HEARING*** was filed electronically in accordance with the local rules and was therefore served electronically on those entities that have properly registered for such electronic service, and by e- mail on the parties listed below.

Brian Behr (via CM/ECF) - Office of the Bankruptcy Administrator
Pamela P. Keenan (via CM/ECF) – Counsel for Noor Staffing Group
Richard A. Prosser (via CM/ECF) – Counsel for Midcap Funding IV Trust
Clint S. Morse (via CM/ECF) – Counsel for South Atlantic Packaging Corporation, LLC
Jordan Blask (via CM/ECF) – Counsel for Noor Staffing Group
Benjamin Higgins (via CM/ECF) – Counsel for Internal Revenue Service
Jennifer B. Lyday (via CM/ECF) – Counsel for Committee
Zachary Malnik (via CM/ECF) – Counsel for Committee
Sloane B. O'Donnell (via CM/ECF) – Counsel for Noor Staffing Group
Joel L. Perrell, Jr. (via CM/ECF) – Counsel for Midcap Funding IV Trust
Richard A. Prosser (via CM/ECF) – Counsel for Midcap Funding IV Trust
Ciara L. Rogers (via CM/ECF) – Counsel for Committee
Paul Rosenblatt (via CM/ECF) – Counsel for Jackson Investment Group LLC
Benjamin Smith (via CM/ECF) – Counsel for Jackson Investment Group LLC
Jillian Nolan Snyder (via CM/ECF) – Counsel for Noor Staffing Group

This the 9th day of June, 2025

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